

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil Case No. 16-2646 (SRN/SER)

JORDAN S. KUSHNER,

Plaintiff,

v.

LIEUTENANT TROY BUHTA,
OFFICER ASHLEE LANGE,
OFFICER KATHLEEN TEMPLE,
SERGEANT KRISTIN TYRA,
LINDA LOKENSGARD,
ERIC W. KALER,

Defendants.

and

Minneapolis City Attorney's Office,

Third Party Respondents.

**MOTION TO COMPEL
COMPLIANCE WITH
SUBPOENA DUCES TECUM**

Plaintiff Jordan S. Kushner hereby moves the Court for an Order compelling the Minneapolis City Attorney's Office to fully comply with Plaintiff's Subpoena duces tecum by disclosing its correspondences relating to its criminal prosecution of Plaintiff, less redactions for work product consisting of mental impressions and opinions regarding the prosecution. In the alternative, Plaintiff requests that the Court do one or more of the following: a) conduct an *in camera* review of the withheld correspondences to determine which materials should be disclosed; and/or b) require the Minneapolis City Attorney's Office to provide a more detailed privilege log than what it previously produced, so as to include an explanation of the topic of each withheld document, and a statement of each

area of information contained in the document including but not limited to 1) attorney legal impressions or opinions, 2) factual information or observations, 3) personal or political comments regarding Jordan Kushner or other parties, and/or 4) specifically giving directions or requests for directions.

This motion is made pursuant to Fed. R. Civ. P. 45(d)(2)(B)(i), and Fed R. Civ. P. 37 including specifically 37(a)(2), and is based on all files and proceedings, and specifically the accompanying Declaration of Plaintiff with attached Exhibits and Memorandum of Law.

Date: March 23, 2017

PETER J. NICKITAS LAW OFFICE, L.L.C.
/s/ Peter J. Nickitas (electronically signed)

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LAW OFFICE OF JORDAN S. KUSHNER

Date: March 23, 2017

s/Jordan S. Kushner
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